

ORIGINAL

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

RECEIVED

AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )  
 )

MM Docket No. 87-268

To: The Commission

**SUPPLEMENT TO PETITION FOR RECONSIDERATION**

WCPX License Partnership ("WCPX"), by its counsel and pursuant to the Order, DA 97-1377, released July 2, 1997, hereby supplements the "Petition for Partial Reconsideration of the Sixth Report and Order" (hereafter "Petition") that WCPX filed on June 13, 1997. In the Order, the Commission afforded parties that had filed petitions for reconsideration a 45-day period, until August 22, 1997, in which to supplement their petitions. During this 45-day period WCPX has undertaken a further review of the DTV channel allotment proposals contained in its Petition based on the recently released OET Bulletin 69. As a consequence of that review, WCPX supplements and modifies certain of those proposals. In support hereof, WCPX states as follows:

**I. INTRODUCTION**

WCPX is the licensee of Television Station WCPX, NTSC Channel 6, Orlando, Florida ("WCPX-TV"). In the Sixth Report and Order, FCC 97-115, released April 21, 1997, the Commission assigned WCPX-TV DTV Channel 58, which is outside the core DTV spectrum and will require WCPX to make a "double switch" to implement DTV operation -- first to Channel

014  
LMAO 1997

58 and then to an unknown channel within the core spectrum at the end of the transition period. WCPX requested in its Petition that the Commission use the low band VHF channels (2-6) for DTV, pointing out that the available engineering data provides no support for excluding Channels 2-6 from the core DTV spectrum, and that the lower power requirements and better propagation characteristics of these channels will provide a more efficient DTV service. WCPX further requested the Commission to clarify that WCPX-TV will be able to switch back to its NTSC Channel 6 assignment to provide DTV service at the end of the transition period. The ability to switch WCPX-TV's DTV operation back to Channel 6 at the end of the transition was and is WCPX's primary objective in seeking reconsideration of the Sixth Report and Order.

However, WCPX recognized that the Commission might not act favorably on this request prior to the date when WCPX-TV is required to begin its DTV operation.<sup>1</sup> Therefore, WCPX also requested that, in the event the Commission determined not to include Channels 2-6 in the core spectrum and allow WCPX-TV to switch its DTV operation back to Channel 6, the Commission should exchange WCPX-TV's Channel 58 DTV assignment with the DTV channel assignment of either unbuilt station WZWY(TV) (DTV Channel 14) or unbuilt station WLCB-TV (DTV Channel 46\*), both of which are in the Orlando market.<sup>2</sup>

---

<sup>1</sup> As a network affiliate in a top-30 market, WCPX-TV is required to commence DTV operation no later than November 1, 1999. 47 C.F.R. Section 73.624(d)(ii).

<sup>2</sup> Reece Associates Limited, the permittee of WZWY(TV), Orlando, Florida, responded to WCPX's Petition. Central Florida Educational Television, Inc., permittee of WLCB-TV, Leesburg, Florida, did not respond to WCPX's Petition.

## **II. DISCUSSION OF DTV CHANNEL 14**

A further analysis of the proposal to exchange DTV Channel 14 and DTV Channel 58 between WCPX-TV and WZWY(TV), using the data available in OET Bulletin 69, reveals that WCPX-TV cannot operate on DTV Channel 14 from its current site due to interference that would be caused to Channel 15\* at New Smyrna Beach, Florida. Because DTV Channel 14 is not usable for WCPX-TV at Orlando, WCPX hereby withdraws the proposal contained in its Petition to exchange DTV Channels 14 and 58 between WCPX-TV and WZWY(TV).

## **III. DISCUSSION OF DTV CHANNEL 46\***

As an alternate to the proposed exchange of DTV Channels 14 and 58, WCPX also proposed the exchange of DTV Channels 46\* and 58 between WCPX-TV and WLCB-TV. The Commission assigned DTV Channel 46\* to WLCB-TV, Leesburg, Florida, which was also assigned NTSC Channel 45\*. WLCB-TV is an unbuilt construction permit. A further analysis of the proposed DTV channel exchange between WCPX-TV and WLCB-TV, indicates that the use of DTV Channel 46 at the WCPX-TV transmitter site would not meet the interference and spacing requirements to NTSC Channel 45\* at WLCB-TV's authorized site.

However, WLCB-TV is unbuilt, and its construction permit expired January 25, 1997. There is no record that the Commission has received any application to extend or reinstate the

WLCB-TV permit.<sup>3</sup> Consequently, there is no longer a valid authorization for NTSC Channel 45\* at Leesburg, and the Commission should consider the channel vacant.

In the Sixth Report and Order, the Commission terminated the licensing of new NTSC stations and declared that "there is no need to maintain vacant NTSC allotments that are not the subject of a pending application or rule making proceeding." Sixth Report and Order, at para. 112. The Commission also determined not to accept applications for new stations on the vacant NTSC allotments that are not the subject of a pending application or a rule making proceeding. Ibid. With respect to vacant noncommercial NTSC allotments, the Commission sought to replace those allotments with new noncommercial reserved DTV allotments, where feasible. Ibid. (emphasis added). In the case of the now vacant Leesburg channel, the Commission can replace vacant NTSC Channel 45\* with DTV Channel 45\*. Using reference coordinates located approximately 12 kilometers northwest of Leesburg for DTV Channel 45\*<sup>4</sup> permits WCPX-TV to use DTV Channel 46 at Orlando in lieu of DTV Channel 58. Alternately, the Commission can

---

<sup>3</sup> This is the second time the WLCB-TV permit has expired. The permit first expired on April 4, 1992. Thereafter, the Video Services Division ("Division") denied an application to reinstate the permit (BPET-920501KE) by letter dated September 10, 1992, to Central Florida Educational Television, Inc. (hereafter "CEF"). The Division denied reconsideration of that action by letter dated September 11, 1995. Thereafter, CEF filed an application for review to the full Commission. By letter dated July 25, 1996, the Chief, Television Branch, reinstated the permit. The Television Branch Chief's authority to act on an application for review to the full Commission, concerning an action of the Video Services Division, is the subject of a "Petition to Deny or Dismiss" filed December 23, 1996, against an application to assign the unbuilt WLCB-TV permit (BAPET-961113IA). However, the reinstated permit expired by its own terms on January 25, 1997. According to the Commission's records, CEF has not filed an application to extend or reinstate the permit.

<sup>4</sup> Because the WLCB-TV permit has expired and the Leesburg Channel 45\* NTSC allotment is vacant, the previously authorized WLCB-TV transmitter site no longer constitutes the reference coordinates for the Leesburg allotment.

substitute DTV Channel 58\* at Leesburg if it assigns DTV Channel 46 to WCPX-TV. Attached hereto is the Technical Statement of WCPX's engineering consultant confirming that the Commission can allot DTV Channel 45\* or Channel 58\* at Leesburg and assign DTV Channel 46 to WCPX-TV consistent with the distance separation and interference parameters used in developing the DTV Table of Allotments.

The original assignment of DTV Channel 58 to WCPX-TV involved three taboo channel short-spacings: to WBSF, NTSC Channel 43, at Melbourne, Florida; to WIRB, NTSC Channel 56, also at Melbourne; and to WACX, NTSC Channel 55 at Leesburg, Florida. The substitution of DTV Channel 46 for DTV Channel 58 and its assignment to WCPX-TV eliminates two of these taboo short-spacings, leaving only the short-spacing to WBSF, NTSC Channel 43 at Melbourne, while it creates no new short-spacings. See attached Technical Statement. The assignment of DTV Channel 46 to WCPX-TV is, therefore, a more efficient and preferable allotment than the original DTV Channel 58 allotment in the Sixth Report and Order.

One of the Commission's allotment priorities in developing the DTV Table was to allocate to existing stations DTV channels within the anticipated core spectrum (Channels 2-51). Sixth Report and Order at para. 76.<sup>5</sup> The channel studies that WCPX undertook in preparing its Petition and this Supplement demonstrate that the highly intensive use of the television spectrum in Florida, and central Florida in particular, results in an extremely limited number of channels that are available for the conversion to DTV. WCPX's channel studies confirm that there are no

---

<sup>5</sup> "We believe that it is important to provide broadcasters with spectrum that is most appropriate and technically suitable for DTV. In this regard, we have developed a Table of DTV Allotments that attempts to provide all eligible broadcasters with a DTV allotment within channels 2-51 without bias against the use of any channel in the band." (Footnote omitted).

other channels currently available within the proposed core spectrum that are available for WCPX-TV other than DTV Channel 46. However, this is a viable DTV allotment only if the Commission deletes now vacant NTSC Channel 45\* at Leesburg, or replaces that NTSC allotment with a DTV channel that does not preclude the use of DTV Channel 46 by WCPX-TV. While WCPX recognizes the Commission's desire to replace vacant NTSC noncommercial allotments with a DTV allotment, doing so is dependent on the feasibility of finding a DTV replacement channel. See Sixth Report and Order at para. 112. WCPX believes the Commission can accomplish this goal and assign DTV Channel 46 to WCPX-TV by replacing NTSC Channel 45\* at Leesburg with either DTV Channel 45\* (site restricted 12 kilometers to the northwest), or alternately substituting DTV Channel 58\* as proposed originally in WCPX's Petition.<sup>6</sup>

The allotment priorities set forth in the Sixth Report and Order prefer the assignment to an existing station of a DTV channel within the core channels (2-51) over the replacement of a vacant NTSC noncommercial allotment with a DTV allotment. Compare Sixth Report and Order at paras. 76 and 112 (it is important to assign a core DTV channel to existing stations, whereas the Commission will replace a vacant noncommercial NTSC allotment only where feasible). If the Commission determines that neither DTV Channels 45\* nor 58\* are viable as a replacement for NTSC Channel 45\* at Leesburg without adversely affecting the assignment of DTV Channel 46 to WCPX-TV, then the Commission must prefer the assignment of DTV Channel 46 to WCPX-TV, and not immediately replace the vacant noncommercial Leesburg allotment with a

---

<sup>6</sup> The allotment of Channel 58\* at Leesburg will have similar taboo channel short-spacings as the assignment of DTV Channel 58 to WCPX-TV in the Sixth Report and Order. See attached Technical Statement. Given the similar problems, if DTV Channel 58 is viable for WCPX-TV, then it should also be a viable replacement for NTSC Channel 45\* at Leesburg.

DTV allotment. This will not permanently preclude a future noncommercial operation at Leesburg, given the Commission's willingness to consider establishing new noncommercial reserved allotments after the DTV transition. See Sixth Report and Order at para. 112.

#### IV. CONCLUSION

The alternate DTV channel proposals contained in WCPX's Petition and in this Supplement are intended to avoid the potential "double switch" problem that WCPX-TV faces if it is forced to initiate DTV operations on assigned Channel 58, and at the end of the transition period move its DTV operation to an as yet unknown channel other than Channel 6. Requiring stations to engage in such double switches increases significantly the cost of implementing the DTV conversion while at the same time causing additional confusion among and disruption to the viewing public. It is particularly inequitable for the Commission to place these additional burdens on a station such as WCPX-TV, for whom the Commission has already increased the burden of converting to DTV with an expedited November 1, 1999, deadline for initiating DTV service. This expedited DTV construction and implementation schedule applies to only 120 stations nationwide (the network affiliates of ABC, CBS, NBC, and Fox in the top-thirty markets). See Section 73.624(d)(1).

As WCPX originally stated in its Petition, it is not opposed to doing its part to help expedite and implement the DTV conversion. However, fundamental fairness requires that the Commission not impose additional burdens on WCPX not imposed on other stations. Yet, the assignment of DTV Channel 58 to WCPX-TV does just that, placing WCPX-TV at a competitive disadvantage compared to all other stations in the Orlando-Daytona Beach-Melbourne Designated Market Area ("DMA"), without any explanation from the Commission as to why WCPX is the

only market station saddled with these obligations. WCPX-TV is the only station in the Orlando DMA that received a DTV channel assignment outside the core channels (2-51). See Section 73.622(b). DTV Channel 58, assigned to WCPX-TV, is the only DTV allotment at a community in the Orlando-Daytona Beach-Melbourne DMA that is outside the core channels.<sup>7</sup> Thus, no other station in the Orlando-Daytona Beach-Melbourne DMA faces the uncertainty and required double switch that WCPX-TV faces absent favorable action on WCPX's Petition.

The proposals contained in WCPX's Petition are modest and consistent with the Commission's stated goal of bringing rapidly to the American public a technologically advanced television service that will meet the competitive and other challenges of the Twenty-First century. See Fifth Report and Order, FCC 97-116, released April 21, 1997, at para. 1. Including the low band VHF channels in the core DTV spectrum will provide a more efficient DTV service that is less subject to noise interference than are current NTSC operations on those channels. See generally, WCPX's Petition at 6-10; "Petition for Reconsideration of Decision Regarding Channels 2-6" filed May 29, 1997, by Certain Channel 2-6 Licensees. Further, allowing stations that currently operate on NTSC Channel 6 to switch their DTV operation to Channel 6 at the end of the transition period will have no adverse effect on noncommercial FM stations and will allow these stations, including WCPX-TV, to take advantage of the power and propagation efficiencies inherent to the low band VHF channels. Ibid. This is the primary focus of WCPX's Petition, and it will eliminate the unfair competitive disadvantage that WCPX-TV faces at the end of the

---

<sup>7</sup> These communities, in addition to the named communities in the DMA, are Cocoa, Clermont, Leesburg, and New Smyrna Beach. See Broadcasting & Cable Yearbook 1997, at page C-201.

transition period if it is forced to engage in a double switch to an uncertain new DTV channel within the core.

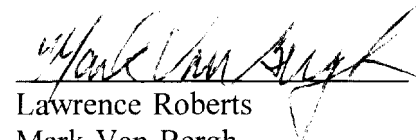
It is only in the event the Commission determines not to act favorably on this request that WCPX has proposed the alternate DTV channel allotments contained in its Petition and modified in this Supplement. The Commission can implement these suggested allotment changes, which involve channels already allotted to the Orlando market, and remain true to the allotment priorities it applied in developing the initial DTV Table of Allotments. The substitution of DTV Channel 46 for DTV Channel 58 will give WCPX-TV a DTV channel that is within the core DTV spectrum, and will allow the Commission to fulfill that allotment priority for every existing station in the Orlando market while eliminating the potential inequity of leaving WCPX-TV as the only station in the market required to make a "double switch" to implement the DTV conversion. At the same time, the proposed substitution of DTV Channel 45\* or Channel 58\* at Leesburg will preserve the vacant noncommercial allotment that now exists following the expiration of the WLCB-TV construction permit.

WHEREFORE, WCPX respectfully requests the Commission to GRANT WCPX's Petition for Partial Reconsideration and to MODIFY the Sixth Report and Order consistent with the requests set forth in WCPX's Petition and in this Supplement.

Respectfully submitted,

WCPX LICENSE PARTNERSHIP

By:

  
Lawrence Roberts  
Mark Van Bergh

DAVIS WRIGHT TREMAINE LLP  
1150 Connecticut Ave., N.W.  
Suite 1100  
Washington, DC 20036  
(202) 296-0533

Its Attorneys

August 22, 1997

TECHNICAL STATEMENT  
WCPX LICENSE PARTNERSHIP  
TELEVISION STATION WCPX-TV  
ORLANDO, FLORIDA

This Technical Statement has been prepared on behalf of WCPX License Partnership, licensee of television broadcast station WCPX Orlando, Florida in support of further comments regarding the FCC's Fifth and Sixth Reports in MM Docket No. 87-268. In previous comments, WCPX requested that the Commission retain channel 6 in the proposed core spectrum or as an alternative, assign a DTV channel to WCPX within the core spectrum. Currently station WCPX operates on channel 6 and has been assigned channel 58 for DTV operation.

WCPX suggested as an alternative to DTV channel 58, either channel 14 or 46. These DTV channels were assigned to long outstanding permittees, which have not yet placed an NTSC station on the air. With the availability of OET Bulletin 69, it has been determined that DTV channel 14 is not a feasible channel for WCPX due to interference created to channel 15 NTSC Station WCEU New Smyrna Beach, Florida. DTV channel 46 does appear to be usable by WCPX, assuming the existing NSTC allotment of channel 45 at Leesburg, FL is simply retained as a DTV allotment.

Orlando, Florida

Page 2 of 4

The WCPX proposal is that it be assigned channel 46 for DTV use and that vacant NTSC channel 45 at Leesburg be changed to DTV channel 45 at a specified reference location approximately 12 kilometers northwest of Leesburg.

#### Allocation Proposal

The attached Figure 1 is a tabulation of separations between pertinent stations associated with the use of DTV channel 46 by WCPX. The tabulation shows a short-spacing with an expired construction permit for use of channel 45 at Leesburg, FL. If it is assumed that channel 45 reverts to vacant allocation status and the reference coordinates are changed to 28-55-02 North Latitude, 81-55-34 West Longitude, the separation requirement of 88.5 kilometers with respect to DTV channel 46 at WCPX is met. From this reference point about 12 kilometers northwest of Leesburg, a potential DTV station on channel 45 can easily provide the required principal community signal to the city.

In addition, the single taboo separation with WBSF Melbourne, FL on channel 43 lessens the taboo violations, which would exist if WCPX actually employed DTV channel 58. Figure 2 shows the separations associated with use of channel 58 by WCPX. There are taboo separation difficulties with NTSC stations WBSF Melbourne, FL (channel

Orlando, Florida

Page 3 of 4

43), WACX Leesburg, FL (channel 55) and WIRB Melbourne, FL (channel 56).

With regard to DTV channel 45 at Leesburg, the attached tabulation of Figure 3 shows pertinent separation requirements from the reference coordinates specified above. The use of DTV channel 45 meets all separation requirements, except to applications at Palatka, FL on channel 42, which due to their "freeze" status, have been ignored.

There is also the opportunity to assign DTV channel 58 to Leesburg at the site referenced above. Such an assignment would result in taboo separation difficulties with three stations (see Figure 4 attached); however, these do not appear to be any worse than the three difficulties encountered with use of channel 58 by WCPX, and as shown on Figure 2.

### Conclusion

Rearrangement of DTV allotments will provide WCPX with a "core" channel DTV station. Channel 45 remains available for non-commercial educational DTV use at Leesburg. The proposed arrangement apparently results in

Orlando, Florida

Page 4 of 4

fewer separation violations than does the proposed  
arrangement in the Sixth Report.



Louis R. du Treil, Sr.  
du Treil, Lundin & Rackley, Inc.  
240 North Washington Boulevard  
Suite 700  
Sarasota, FL 34236

(941) 366-2611

August 22, 1997

TECHNICAL STATEMENT  
WCPX LICENSE PARTNERSHIP  
TELEVISION STATION WCPX-TV  
ORLANDO, FLORIDA

DTV to NTSC Separation Study

Job Title :WCPX Orlando, FL DTV CH46  
Zone : 3  
Channel 46 (662-668 MHz)

Separation Buffer 32 km  
FCC TV DB Date : 08/15/97  
Coordinates : 28-36-08 81-05-37

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
ALLOC. FL	KENANSVILLE	-	31(o) III	0	27-44-18 80-58-14	172.8	96.50 -1.10	24.1/96.6 SHORT
EFFECTIVE 6-7-90								
NEW APP	KENANSVILLE FL	BPCT-960920IC	31(o) III	5000 254	27-27-30 80-56-00	172.9	127.75 31.15	24.1/96.6 CLEAR
REQUESTS A WAIVER OF FREEZE.								
WWWB LIC	LAKELAND FL	BLCT-860909LB	32(o) III	3020 271	27-50-15 81-56-53	224.8	119.24 22.64	24.1/96.6 CLEAR
WWWB CP MOD	LAKELAND FL	BMPCT-960313KF	32(o) III	5000 331	27-50-15 81-56-53	224.8	119.24 22.64	24.1/96.6 CLEAR
WWWB APP	LAKELAND FL	BPCT-961216KE	32(o) III	5000 332	27-50-15 81-56-53	224.8	119.24 22.64	24.1/96.6 CLEAR
NEW APP	CRYSTAL RIVER FL	BPET-960919LB	*39(-) III	724. 151	28-40-53 82-23-12	274.3	126.74 30.14	24.1/96.6 CLEAR
REQUESTS A WAIVER OF FREEZE.								
NEW APP	PALATKA FL	BPET-960724KQ	*42(o) III	417. 344	29-31-08 81-19-02	348.0	103.91 7.31	24.1/96.6 CLOSE
REQUESTS A WAIVER OF FREEZE.								
ALLOC. FL	PALATKA	-	*42(o) III	0	29-38-53 81-38-07	335.8	127.35 30.75	24.1/96.6 CLEAR
WBSF LIC	MELBOURNE FL	BLCT-820816KE	43(+) III	4170 299	28-18-26 80-54-48	151.7	37.17 -13.07	24.1/96.6 SHORT
WBSF APP	MELBOURNE FL	BPCT-970219KF	43(+) III	2290 303	28-18-26 80-54-48	151.7	37.17 -13.07	24.1/96.6 SHORT
WLCBTV CP	LEESBURG FL	BPET-920501KE	*45(-) III	5000 138	28-51-35 81-46-27	293.5	72.36 -16.14	9.7/88.5 SHORT
CP CANCELLED 09-10-92								
WTVK LIC	NAPLES FL	BLCT-910718KH	46(o) III	3160 309	26-25-22 81-37-49	192.4	247.26 2.66	244.6 CLOSE

TECHNICAL STATEMENT  
WCPX LICENSE PARTNERSHIP  
TELEVISION STATION WCPX-TV  
ORLANDO, FLORIDA

DTV to NTSC Separation Study

Job Title :WCPX Orlando, FL DTV CH46  
Zone : 3  
Channel 46 (652-668 MHz)

Separation Buffer 32 km  
FCC TV DB Date : 08/15/97  
Coordinates : 28-36-08 81-05-37

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WTVK	NAPLES		46(o)	5000 DA	26-25-22	192.4	247.26	244.6
APP	FL	BPCT-960711KH	III	310	81-37-49		2.66	CLOSE
ALLOC.	SEBRING	-	*48(o)	0	27-29-42	195.6	127.39	24.1/96.6
	FL		III		81-26-30		30.79	CLEAR
NEW	SEBRING		60(o)	1510	27-30-29	194.9	125.48	24.1/96.6
APP	FL	BPCT-960920YT	III	67	81-25-18		28.88	CLEAR
REQUESTS A WAIVER OF FREEZE.								
ALLOC.	SEBRING	-	60(o)	0	27-29-42	195.6	127.39	24.1/96.6
	FL		III		81-26-30		30.79	CLEAR

\*\* End of TV Separation Study for Channel 46 \*\*

Figure 2

TECHNICAL STATEMENT  
WCPX LICENSE PARTNERSHIP  
TELEVISION STATION WCPX-TV  
ORLANDO, FLORIDA

DTV to NTSC Separation Study

Job Title :WCPX Orlando, FL DTV CH58  
Zone : 3  
Channel 58 (734-740 MHz)

Separation Buffer 32 km  
FCC TV DB Date : 08/15/97  
Coordinates : 28-36-08 81-05-37

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WBSF LIC	MELBOURNE FL	BLCT-820816KE	43(+) III	4170 299	28-18-26 80-54-48	151.7 -13.07	37.17	24.1/96.6 SHORT
WBSF APP	MELBOURNE FL	BPCT-970219KF	43(+) III	2290 303	28-18-26 80-54-48	151.7 -13.07	37.17	24.1/96.6 SHORT
WACX LIC	LEESBURG FL	BLCT-860319KE	55(o) III	5000 515	28-55-16 81-19-09	328.3 -17.55	41.65	24.1/96.6 SHORT
WIRB CP	MELBOURNE FL	BPCT-960118KG	56(o) III	5000 472	28-05-37 81-07-28	183.0 -32.36	56.46	24.1/96.6 SHORT
WIRB APP	MELBOURNE FL	BMPCT-961107KF	56(o) III	5000 472	28-05-37 81-07-28	183.0 -32.36	56.46	24.1/96.6 SHORT
WIRB LIC	MELBOURNE FL	BLCT-860826KF	56(o) III	2040 305	27-49-35 80-42-20	156.1 -2.55	94.05	24.1/96.6 SHORT
ALLOC.	BUNNELL FL	-	58(o) III	0	29-28-00 81-15-30	350.6 -147.45	97.15	244.6 SHORT
NEW APP	SEBRING FL	BPCT-960920YT	60(o) III	1510 67	27-30-29 81-25-18	194.9 28.88	125.48	24.1/96.6 CLEAR
	REQUESTS A WAIVER OF FREEZE.							
ALLOC.	SEBRING FL	-	60(o) III	0	27-29-42 81-26-30	195.6 30.79	127.39	24.1/96.6 CLEAR
WRBW CP MOD	ORLANDO FL	BMPCT-931213KE	65(o) III	5000 465	28-34-51 81-04-32	143.5 21.13	2.97	24.1/96.6 CLEAR

\*\* End of TV Separation Study for Channel 58 \*\*

TECHNICAL STATEMENT  
WCPX LICENSE PARTNERSHIP  
TELEVISION STATION WCPX-TV  
ORLANDO, FLORIDA

DTV to NTSC Separation Study

Job Title :LEESBURG, FL DTV CH45  
Zone : 3  
Channel 45 (656-662 MHz)

Separation Buffer 32 km  
FCC TV DB Date : 08/15/97  
Coordinates : 28-55-02 81-55-34<sup>1</sup>

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WTTA LIC	ST. PETERSBURG FL	BLCT-910703KG	38(o) III	1410 438	27-50-32 82-15-46	195.5	123.63 27.03	24.1/96.6 CLEAR
WTTA APP	ST. PETERSBURG FL	BPCT-950629KQ	38(o) III	5000 438	27-50-32 82-15-46	195.5	123.63 27.03	24.1/96.6 CLEAR
ALLOC.	PALATKA FL	-	*42(o) III	0	29-38-53 81-38-07	19.1	85.80 -10.80	24.1/96.6 SHORT
NEW APP	PALATKA FL	BPET-960724KQ	*42(o) III	417. 344	29-31-08 81-19-02	41.3	89.19 -7.41	24.1/96.6 SHORT
REQUESTS A WAIVER OF FREEZE.								
NEW APP	PALATKA FL	BPET-960920WY	*42(o) III	5000 DA 123	29-51-15 81-20-56	28.1	118.01 21.41	24.1/96.6 CLEAR
REQUESTS A WAIVER OF FREEZE.								
WBSF LIC	MELBOURNE FL	BLCT-820816KE	43(+) III	4170 DA 299	28-18-26 80-54-48	124.2	119.93 23.33	24.1/96.6 CLEAR
WBSF APP	MELBOURNE FL	BPCT-970219KF	43(+) III	2290 DA 303	28-18-26 80-54-48	124.2	119.93 23.33	24.1/96.6 CLEAR
WTOG LIC	ST. PETERSBURG FL	BLCT-900705KF	44(+) III	5000 454	27-49-48 82-15-59	195.5	125.03 36.53	9.7/88.5 CLEAR
WLCBT CP	LEESBURG FL	BPET-920501KE	*45(-) III	5000 DA 138	28-51-35 81-46-27	113.3	16.14 -228.46	244.6 SHORT
CP CANCELLED 09-10-92								
WTGLTV LIC	COCOA FL	BLCT-821006KG	52(o) III	4680 DA 285	28-18-26 80-54-48	124.2	119.93 23.33	24.1/96.6 CLEAR
WGFL CP MOD	HIGH SPRINGS FL	BMPCT-960920KF	53(+) III	5000 DA 278	29-37-47 82-34-24	321.8	100.97 4.37	24.1/96.6 CLOSE

\*\* End of TV Separation Study for Channel 45 \*\*

<sup>1</sup> From a reference site about 12 KM northwest of Leesburg.

TECHNICAL STATEMENT  
WCPX LICENSE PARTNERSHIP  
TELEVISION STATION WCPX-TV  
ORLANDO, FLORIDA

DTV to NTSC Separation Study

Job Title : LEESBURG, FL DTV CH58  
Zone : 3  
Channel 58 (734-740 MHz)

Separation Buffer 32 km  
FCC TV DB Date : 08/15/97  
Coordinates : 28-55-02 81-55-34

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WBSF LIC	MELBOURNE FL	BLCT-820816KE	43(+) III	4170 299	28-18-26 80-54-48	124.2	119.93 23.33	24.1/96.6 CLEAR
WBSF APP	MELBOURNE FL	BPCT-970219KF	43(+) III	2290 303	28-18-26 80-54-48	124.2	119.93 23.33	24.1/96.6 CLEAR
WTOG LIC	ST. PETERSBURG FL	BLCT-900705KF	44(+) III	5000 454	27-49-48 82-15-59	195.5	125.03 28.43	24.1/96.6 CLEAR
WBHSTV LIC	TAMPA FL	BLCT-880616KH	50(o) III	4170 445	27-50-32 82-15-46	195.5	123.63 27.03	24.1/96.6 CLEAR
WBHSTV APP	TAMPA FL	BPCT-960710KG	50(o) III	5000 445	27-50-32 82-15-46	195.5	123.63 27.03	24.1/96.6 CLEAR
WOGX LIC	OCALA FL	BLCT-831107KI	51(-) III	2750 280	29-21-32 82-19-53	321.4	62.87 -33.73	24.1/96.6 SHORT
WACK LIC	LEESBURG FL	BLCT-860319KE	55(o) III	5000 515	28-55-16 81-19-09	89.4	59.20 -35.10	24.1/96.6 SHORT
WIRB CP	MELBOURNE FL	BPCT-960118KG	56(o) III	5000 472	28-05-37 81-07-28	139.3	120.39 23.79	24.1/96.6 CLEAR
WIRB APP	MELBOURNE FL	BMPCT-961107KF	56(o) III	5000 472	28-05-37 81-07-28	139.3	120.39 23.79	24.1/96.6 CLEAR
ALLOC.	BUNNELL FL	-	58(o) III	0	29-28-00 81-15-30	46.5	89.04 -155.56	244.6 SHORT
ALLOC.	GAINESVILLE FL	-	61(+) III	0	29-32-07 82-10-44	340.4	72.79 -23.81	24.1/96.6 SHORT
REF. POINT 12.5 MILES S.E.								
NEW APP	GAINESVILLE FL	BPCT-960920WR	61(+) III	5000 288	29-37-47 82-34-24	321.8	100.97 4.37	24.1/96.6 CLOSE
REQUESTS A WAIVER OF FREEZE.								
WRBW CP MOD	ORLANDO FL	BMPCT-931213KE	65(o) III	5000 465	28-34-51 81-04-32	114.1	91.07 -5.53	24.1/96.6 SHORT

\*\* End of TV Separation Study for Channel 58 \*\*

## CERTIFICATE OF SERVICE

I, Mark Van Bergh, hereby certify that I have, this 22nd day of August, 1997, caused to be served by first class mail except as otherwise noted, a true copy of the foregoing "Supplement to Petition for Partial Reconsideration" to the following:

\*Richard M. Smith, Chief  
Office of Engineering and Technology  
Federal Communications Commission  
2000 M Street, N.W., Room 480  
Washington, DC 20554

\*Douglas W. Webbink, Chief  
Policy and Rules Division  
Federal Communications Commission  
2000 M Street, N.W., Room 536  
Washington, DC 20554

\*Robert M. Pepper, Chief  
Office of Plans and Policy  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, DC 20554

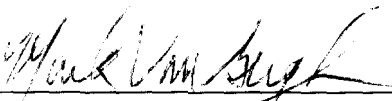
\*Roy J. Stewart, Chief  
Mass Media Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 314  
Washington, DC 20554

Kurt A. Wimmer, Esquire  
Erika F. King, Esquire  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

Neal A. Jackson, Esquire  
Gregory A. Lewis, Esquire  
National Public Radio, Inc.  
635 Massachusetts Avenue, N.W.  
Washington, D.C. 20001-3753

Gerald Stevens-Kittner, Esquire  
Naomi S. Travers, Esquire  
Arter & Hadden  
1801 K Street, N.W.  
Suite 400K  
Washington, D.C. 20006

James F. Miller, Esquire  
Miller & Woods, P.A.  
1400 Center Park Boulevard  
Suite 860  
West Palm Beach, FL 33401

  
Mark Van Bergh

\* Hand Delivery